



Adapted Privacy Impact Assessment

Geocaching

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One Privacy Impact Assessment (PIA) may be prepared to cover multiple websites or applications that are functionally comparable as long as Agency or Bureau practices are substantially similar across each website or application. However, any use of a third-party website or application that raises distinct privacy risks requires a complete PIA exclusive to the specific website or application. Department-wide PIAs must be elevated to the Office of the Chief Information Officer (OCIO) for review and approval.

SECTION 1: Specific Purpose of the Agency's Use of the Third-Party Website or Application

1.1 What is the specific purpose of the agency's use of the third-party website or application and how does that use fit with the agency's broader mission?

Geocaching is a game in which participants use a Global Positioning System (GPS) receiver or GPS-enabled mobile device to hide and find containers, called "geocaches" or "caches", anywhere in the world. The cache and its contents may vary, but is often a small container containing a logbook that can be signed or small trinkets for geocachers to collect. Currently, the largest geocaching web site is Geocaching.com, a commercial web site owned by Seattle, Washington, based Groundspeak, Inc. Geocaching.com claims to have over 1.7 million active caches and over 5 million participants worldwide.

Participants who hide caches utilize one of a number of commercial or non-commercial web sites to submit posts that notify other users of the hidden caches. The posts can provide the cache's GPS coordinates, or the search for the cache can be made more difficult by adding criteria such as requiring users to answer trivia questions before the GPS coordinates are revealed or by providing a progressive trail of GPS coordinates that must be followed. Users who wish to find hidden caches can start their searches by visiting a geocaching web site and performing a search based on various criteria, with an address or a zip code often being the primary search filter.

Users who wish to hide or locate caches using Geocaching.com must be registered Geocaching.com users. The registration process requires the submission of a first and last name, username, password, and email address. Registered users can modify their profiles with additional information, including general geographic location (such as metropolitan area or state), occupation, an avatar and a profile image. Users can identify friends who are also Geocaching.com members, and Geocaching.com maintains statistics concerning the caches that the user has hidden or found. Through profile settings, users can control who sees their information and what information is shared with other users. Users can send email messages to other users using Geocaching.com's webmail system (which does not display users' email addresses) and participate in forums on the Geocaching.com web site. Users can also provide comments and feedback on postings for specific caches. The Department of the Interior (DOI) has no control over content in Geocaching.com, except for official DOI postings.

DOI will utilize geocaching to place caches at various DOI locations, such as national parks. Caches will be strategically located near monuments and other points of interest and will include clues and search information designed to make the geocaching process an educational experience for players. DOI's use of geocaching will promote public participation and collaboration, bring additional visitors to national parks and other DOI



locations, and educate the public about the mission of DOI and its Bureaus and Offices. DOI will not use a paper log book at its cache sites or otherwise create paper records through geocaching.

The primary account holder is DOI's Office of Communications, which will be responsible for ensuring the use of the DOI's official Geocaching.com account is appropriate and all information posted is approved for public dissemination. DOI Bureaus and Offices that have their own Geocaching.com accounts are responsible for ensuring that all account use is appropriate and all information posted is approved for public dissemination in accordance with applicable laws, regulations, and DOI privacy, security and social media policies.

1.2 Is the agency's use of the third-party website or application consistent with all applicable laws, regulations, and policies? What are the legal authorities that authorize the use of the third-party website or application?

Presidential Memorandum on Transparency and Open Government, January 21, 2009; OMB M-10-06, Open Government Directive, December 8, 2009; OMB M-10-23, Guidance for Agency Use of Third-Party Websites and Applications, June 25, 2010; the Paperwork Reduction Act, 44 U.S.C. 3501; the Clinger-Cohen Act of 1996, 40 U.S.C. 1401; OMB Circular A-130; 210 Departmental Manual 18; 110 Departmental Manual 5.

SECTION 2: Any PII that is Likely to Become Available to the Agency Through the Use of the Third-Party Website or Application

2.1 What PII will be made available to the agency?

If a Geocaching.com user interacts with DOI through its official Geocaching.com account, posts forum comments, sends an email, requests information or submits feedback through Geocaching.com, their name, username, profile image, geographic location, and other personal information provided by the user may become available to DOI. DOI does not collect or share PII from the use of Geocaching.com. However, there may be unusual circumstances where there is evidence of criminal activity, a threat to the government, a threat to the public, or an employee violation of DOI policy. This information may include name, username, profile image, geographic location, or other personal information provided by the user, and may be used to notify the appropriate agency officials or law enforcement organizations.

If a user locates a DOI cache and provides a comment or feedback related to the cache on Geocaching.com, DOI may obtain information about a user's presence at a particular location on a specific date. If the feedback is being provided using a mobile device such as a smartphone, the location based information may be provided in real time.

2.2 What are the sources of the PII?

Potential sources of information are geocaching participants world-wide, including members of the general public and Federal employees, and may include other government agencies and private organizations.



2.3 Will the PII be collected and maintained by the agency?

DOI does not collect or share PII from the use of Geocaching.com. However, there may be unusual circumstances where there is evidence of criminal activity, a threat to the government, a threat to the public, or an employee violation of DOI policy. This information may include name, username, profile image, geographic location, or other personal information provided by the user, and may be used to notify the appropriate agency officials or law enforcement organizations.

Any DOI Bureau or Office that uses the Geocaching.com in a way that creates a system of records must complete a separate PIA for the specific use and collection of information, and must maintain the records in accordance with DOI-08, Social Networks system of records notice. DOI Privacy Act system of records notices may be viewed at http://www.doi.gov/ocio/information_assurance/privacy/privacy-act-notices-9-06-06.cfm.

2.4 Do the agency's activities trigger the Paperwork Reduction Act (PRA) and, if so, how will the agency comply with the statute?

No, DOI is not using Geocaching.com to survey the public or in any manner that would trigger the requirements of the Paperwork Reduction Act.

SECTION 3: The Agency's Intended or Expected Use of the PII

3.1 Generally, how will the agency use the PII described in Section 2.0?

DOI does not collect or share PII from the use of Geocaching.com. However there may be unusual circumstances where there is evidence of criminal activity, a threat to the government, a threat to the public, or an employee violation of DOI policy. This information may include name, username, profile image, geographic location, or other personal information provided by the user, and may be used to notify the appropriate agency officials or law enforcement organizations.

3.2 Provide specific examples of the types of uses to which PII may be subject.

If a Geocaching.com user interacts with DOI through its official Geocaching.com account, posts forum comments, sends an email, requests information or submits feedback through Geocaching.com, their name, username, profile image, geographic location, and other personal information provided by the user may become available to DOI. DOI may use this information to interact with the user or to provide the requested information or service. DOI does not collect or share PII from the use of Geocaching.com. There may also be unusual circumstances where there is evidence of criminal activity, a threat to the government, a threat to the public, or an employee violation of DOI policy. This information may include name, username, profile image, geographic location, or other personal information provided by the user, and may be used to notify the appropriate agency officials or law enforcement organizations.



SECTION 4: Sharing or Disclosure of PII

4.1 With what entities or persons inside or outside the agency will the PII be shared, and for what purpose will the PII be disclosed?

DOI does not collect or share PII from the use of Geocaching.com. However, there may be unusual circumstances where there is evidence of criminal activity, a threat to the government, a threat to the public, or an employee violation of DOI policy. This information may include name, username, profile image, geographic location, or other personal information provided by the user, and may be used to notify the appropriate agency officials or law enforcement organizations.

4.2 What safeguards will be in place to prevent uses beyond those authorized under law and described in this PIA?

The creation of caches by DOI and posts identifying the caches will be reviewed and approved prior to creation and posting on DOI's office Geocaching.com site. The use of DOI's geocaching accounts will be limited to authorized personnel and controlled by user name and password protection, so any privacy risks for the unauthorized disclosure of personal data by DOI is mitigated. However, except for official postings DOI does not control the content, terms of use or privacy policy on Geocaching.com. There could potentially be millions of Geocaching.com users who have access to information posted on Geocaching.com, including the general public, Federal employees, private organizations, and Federal, State, Tribal and local agencies.

Geocaching.com requires users to provide their first and last name, a username, and an email address (which is not publicly displayed). Additional personal information is provided at the user's discretion. However, the provision of information and user consent applies only to terms of use for Geocaching.com. DOI has no control over access restrictions or procedures on Geocaching.com, or the personal information provided by users. Geocaching.com is responsible for protecting its users' privacy and the security of users' data. Geocaching.com users are subject to Geocaching.com's Privacy Policy and Terms of Service, and can adjust their profile settings to protect their personal information. Users should review Geocaching.com's Terms of Service and Privacy Policy for information regarding the protection of individual users' privacy and security.

SECTION 5: Maintenance and Retention of PII

5.1 How will the agency maintain the PII, and for how long?

DOI does not maintain PII on Geocaching.com users. However, for official DOI postings retention periods vary as records are maintained in accordance with the applicable records schedule for each bureau or office and specific type of record maintained. Records published through geocaching activities represent public informational releases by DOI, and must be assessed on a case-by-case basis depending on the



individual/entity releasing the information and the purpose of the release. There is no single records schedule that covers all informational releases to the public at this time.

5.2 Was the retention period established to minimize privacy risk?

Retention periods may vary depending on agency requirements and the subject of the records for the DOI Bureau or Office maintaining the records. In cases where data serves to support agency business, it must be filed with the pertinent records they support and follow the corresponding disposition instructions. Comments used as supporting documentation will utilize the disposition instructions of the records they are filed with.

SECTION 6: How the Agency will Secure PII

6.1 Will privacy and security officials coordinate to develop methods of securing PII?

Yes. Privacy and security officials work with the Office of Communications to develop methods for protecting individual privacy and securing PII that becomes available to DOI.

6.2 How will the agency secure PII? Describe how the agency will limit access to PII, and what security controls are in place to protect the PII.

DOI does not collect or share PII from the use of Geocaching.com. However, there may be unusual circumstances where there is evidence of criminal activity, a threat to the government, a threat to the public, or employee violation of DOI policy. This information may include name, username, profile image, geographic location, or other personal information provided by the user, and may be used to notify the appropriate agency officials or law enforcement organizations.

SECTION 7: Identification and Mitigation of Other Privacy Risks

7.1 What other privacy risks exist, and how will the agency mitigate those risks?

Except for official DOI postings, DOI does not have any control over the content in Geocaching.com or the personal information posted by Geocaching.com participants, including members of the general public and Federal employees. DOI systems do not share data with geocaching applications.

DOI's Privacy Policy informs the public of how DOI handles personally identifiable information that becomes available through interaction on the DOI official website. The DOI Privacy Policy also informs the public that DOI has no control over access restrictions or privacy procedures on third-party websites and applications, and individuals are subject to third-party application's privacy and security policies. DOI's linking policy informs the public that they are subject to third-party privacy policies when they leave a DOI official website to link to third-party sites.



Geocaching.com is independently operated and owned by a third-party that controls access to user data. Geocaching.com participants control access to their own PII, through profile settings and via decisions regarding what personal information they provide. DOI has the same access as any member of the public to the personal information posted by users on Geocaching.com and has no control over user content posted on Geocaching.com.

Because the game of geocaching is centered around fixed locations, geocaching presents additional concerns related to geolocation functions and geospatial privacy concerns. Users who create posts indicating that they have found a specific cache are creating a public record of their geographic location. The utilization of smartphones can create a real time identification of a user's location. Geolocation-related privacy concerns are endemic to geocaching, and geocaching participants have the option not to engage in geocaching activities.

DOI cannot guarantee a specific level of privacy protection or security for third-party applications. Users concerned about privacy, including location-based privacy matters, may take various steps, including adjusting profile settings, to prevent the public dissemination of PII, but DOI makes no representation about the effectiveness of the settings options offered by Geocaching.com. Users also can control access to their own PII through decisions regarding the personal information they provide, and can decide not to participate in Geocaching.com searches. Geocaching.com participants and users are advised to review the application's Terms of Service and Privacy Policy prior to use.

7.2 Does the agency provide appropriate notice to individuals informing them of privacy risks associated with the use of third-party website or application?

DOI's Privacy Policy informs the public on how DOI handles personally identifiable information that becomes available through interaction on the DOI official website. The Privacy Policy also informs the public that DOI has no control over access restrictions or privacy procedures on third-party websites, and that individuals are subject to third-party website privacy and security policies. DOI's linking policy informs the public that they are subject to third-party privacy policies when they leave a DOI official website to link to third-party social media web sites.

DOI will post a privacy notice on its official Geocaching.com profile which will inform users that Geocaching.com is a third-party application. It also informs users on how DOI handles personally identifiable information that becomes available through user interaction and how DOI uses the information. Users of Geocaching.com are directed to the DOI Privacy Policy for information handling practices which may be viewed at: <http://www.doi.gov/privacy.cfm>.

SECTION 8: Creation or Modification of a System of Records

8.1 Will the agency's activities create or modify a "system of records" under the Privacy Act of 1974?



No. DOI will not collect, maintain or disseminate PII through the use of Geocaching.com. Any DOI Bureau or Office that creates a system of records through the use of Geocaching.com will complete a separate PIA for that specific use and collection of information, and must maintain the records in accordance with DOI-08, Social Networks system of records notice, which may be viewed at http://www.doi.gov/ocio/information_assurance/privacy/privacy-act-notices-9-06-06.cfm.

8.2 Provide the name and identifier for the Privacy Act system of records.

DOI does not collect, maintain or disseminate PII obtained through the use of Geocaching.com. Any DOI Bureau or Office that creates a system of records through the use of Geocaching.com will complete a separate PIA for that specific use and must maintain the records in accordance with DOI-08, Social Networks system of records notice which may be viewed at http://www.doi.gov/ocio/information_assurance/privacy/privacy-act-notices-9-06-06.cfm.